

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

IN RE: CRIMINAL COMPLAINT
AND ARREST WARRANT

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No. 1:25jm325

MOTION TO SEAL CRIMINAL COMPLAINT AND ARREST WARRANT

Pursuant to Local Rule 49(B) of this Court's Local Criminal Rules, the United States asks for an Order to seal the criminal complaint and arrest warrant in this case until the warrant is executed, except that a copy of the warrant be made available to law enforcement agents for execution of the warrant.

Disclosure of the criminal complaint or the arrest warrant before the defendant is arrested on the complaint may cause the defendant to abscond and/or evidence to be destroyed. Such sealing is within the discretion of this Court and may be granted "for any legitimate prosecutorial need." *United States v. Ramey*, 791 F.2d 317, 321 (4th Cir. 1986). *See Media General Operations, Inc. v. Buchanan*, 417 F.3d 424, 430-31 (4th Cir. 2005) (sealing warrant applications is appropriate where there is a substantial probability that release of the sealed documents would compromise the government's on-going investigation).

Pursuant to Local Rule 49(B)(3), the criminal complaint and arrest warrant should remain sealed until the defendant is arrested on the complaint, at which time the complaint and warrant should be unsealed without further action of the Court.

Respectfully submitted,

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